

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE: THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
As representative of THE COMMONWEALTH  
OF PUERTO RICO, ET AL.

Debtors

Case No. 17-BK-3283 (LTS)

(Jointly Administered)  
PROMESA TITLE III

**MOTION TO SUPPLEMENT OPPOSITION TO OBJECTION TO CLAIM**

TO THE HONORABLE COURT:

COMES NOW, DOWNTOWN DEVELOPMENT CORP (DDC) through the undersigned attorney and hereby enters its appearance and respectfully states and prays as follows:

1. On May 22<sup>nd</sup>, 2023, DDC replied (Doc# 24289) to Debtor's objection (Doc# 24050) to the claim number 29504 (1823) filed on 05/27/2018 filed by DDC in the amount of \$437,284.26, arguing that "Proof of claim purports to assert liability on the basis of submitted invoice(s). Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system".

2. DDC hereby supplements its opposition to the objection to claim 29504, to include the letter from the Puerto Rico Department of Public Works (DTOP), dated September 29<sup>th</sup>, 2014, where DTOP -which is the lessee in the contract which claim (29504) Debtor has objected-, unilaterally terminated the lease contract effectively October 31, 2014 (**Exhibit 1**).

WHEREFORE, it is respectfully prayed that this Honorable Court grant the Claim Number 29504, and deny Debtor's objection to Claim Number 29504.

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed

herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may, in its discretion, schedule a hearing.

I HEREBY CERTIFY: That on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of this filing to all parties in interest as per master address list.

In San Juan, Puerto Rico, this 24<sup>nd</sup> day of May, 2023.

/s/ Rosendo E. Miranda López,  
U.S.D.C. No. 219405  
Rosendo E. Miranda López, Esq.  
Attorney for DDC  
PO Box 192096  
San Juan, PR 00919-2096  
Tel.724-3393 Fax: 723-6774  
[notificatio@rmirandalex.net](mailto:notificatio@rmirandalex.net)